

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 03-562-A
)	
JOSEPH LAWRENCE BLEICH,)	
)	Judge James C. Cacheris
Defendant.)	February 6, 2004

STATEMENT OF FACTS

If this case went to trial, the United States would prove by admissible evidence and beyond a reasonable doubt the following:

1. The defendant, JOSEPH LAWRENCE BLEICH, is a 19-year-old citizen of the United States.

_____2. Beginning on or about May 1, 2003, and continuing through on or about June 18, 2003, within the Eastern District of Virginia and elsewhere, Joseph Lawrence Bleich, did unlawfully and knowingly combine, conspire, confederate and agree together with David Alexander Post, and with other persons known and unknown to the grand jury, with intent to defraud, to falsely make, forge, and counterfeit obligations and securities of the United States, namely, more than \$1,000 of United States currency, in violation of Title 18, United States Code, Section 371.

3. In or about May 2003, in Fairfax County, Virginia, Bleich, Post, and an unindicted conspirator purchased a scanner to counterfeit United States currency. Bleich, Post, the unindicted conspirator, and a second unindicted conspirator used computer equipment, including

the newly purchased scanner, to print approximately \$4,000 in counterfeit United States twenty dollar bills.

4. In or about May 2003, Bleich, Post, and the two unindicted conspirators then traveled to a concert in West Virginia to purchase marijuana with the counterfeit United States currency. Upon arriving in West Virginia, each of the four conspirators, including Bleich, purchased marijuana using the counterfeit currency.

5. When they returned from West Virginia to Fairfax County, Virginia, in May 2003, Bleich sold approximately ten counterfeit twenty dollar bills, or \$200 in counterfeit currency, to a high school classmate.

Respectfully submitted,

Paul J. McNulty
United States Attorney

By:

Morris R. Parker, Jr.
Assistant United States Attorney

Raymond E. Patricco, Jr.
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Joseph Lawrence Bleich, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Joseph Lawrence Bleich
Defendant

I am Preston Burton, the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Preston Burton, Esquire
Attorney for Joseph Lawrence Bleich